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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RUSSELL E. BURNS, et al.,

Plaintiffs,

v.

B & B Sweeping, a California Limited Liability
Company; Brett Herring, an individual,

Defendants.

Case No.: C14-1798 VC

**PLAINTIFFS' REQUEST TO CONTINUE
CASE MANAGEMENT CONFERENCE;
~~PROPOSED~~ ORDER THEREON**

Date: July 25, 2014
Time: 10:30 p.m.
Location: 450 Golden Gate Avenue
San Francisco, CA 94102
Courtroom 4, 17th Floor
Judge: Honorable Vince Chhabria

Plaintiffs respectfully request that the Case Management Conference, currently on calendar for July 25, 2014, be continued for approximately sixty (60) days. Good cause exists for the granting of the continuance, as follows:

1. As the Court's records will reflect, this action was filed on April 18, 2014. The Defendants were served on April 24, 2014, and Proofs of Service of Summons were filed with the Court on May 2, 2014 (Dkt. #11 and #12). Defendants failed to plead or otherwise respond to the lawsuit, and the Clerk entered default as to Defendants on June 25, 2014 (Dkt. #15). Defendants were duly served with a copy of the Clerk's Notice of Default Entry, and a Proof of Service of same was filed with the Court on June 26, 2014 (Dkt. #16).

2. Plaintiffs are preparing a Motion for Default Judgment, and anticipate filing the Motion within the next thirty (30) days. Accordingly, Plaintiffs respectfully request that the Case

1 Management Conference, currently scheduled for July 25, 2014, be continued for 60 days to allow
2 time for the preparation and filing of Plaintiffs' Motion for Default Judgment.

3 4. There are no issues that need to be addressed by the parties at the currently
4 scheduled Case Management Conference. In the interest of conserving costs as well as the Court's
5 time and resources, Plaintiffs respectfully request that the Court continue the currently scheduled
6 Case Management Conference.

7 I declare under penalty of perjury that I am the attorney for the Plaintiffs in the above
8 entitled action, and that the foregoing is true of my own knowledge.

9 Executed this 14th day of July, 2014, at San Francisco, California.

10
11 SALTZMAN & JOHNSON
LAW CORPORATION

12 By: _____/S/
13 Jordan D. Mazur
14 Attorneys for Plaintiffs

15 IT IS SO ORDERED.

16 The currently set Case Management Conference is hereby continued to
17 September 23, 2014 at 10:00 a.m., and all previously set deadlines and dates related to this
18 case are continued accordingly.

19 Date: July 16, 2014

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UNITED STATES DISTRICT COURT JUDGE

PROOF OF SERVICE:

I, the undersigned, declare:

I am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On **July 14, 2014**, I served the following document(s) on the parties to this action in the manner described below:

**PLAINTIFFS' REQUEST TO CONTINUE CASE MANAGEMENT
CONFERENCE; [PROPOSED] ORDER THEREON**

XX **MAIL**, being familiar with the practice of this office for the collection and the processing of correspondence for mailing with the United States Postal Service, and deposited in the United States Mail copies of the same to the business addresses as specified below, in a sealed envelope fully prepared.

To:

**B & B Sweeping
3532 S. Ash Street
Stockton, CA 95206**

**Brett Herring
3532 S. Ash Street
Stockton, CA 95206**

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 14th day of July 2014, at San Francisco, California.

/S/
Michelle Valentine, Paralegal